



4. The information received so far on the one hundred and sixty Plaintiffs is not sufficient for trial or mediation on those Plaintiffs, and Defendant has received no information on the remaining sixty or so Plaintiffs.

5. Defendant has proposed to Plaintiffs that once Defendant has received work sheets from all Plaintiffs, that Defendant would review all work sheets against Defendant's records and make a settlement offer as to each Plaintiff, separately.

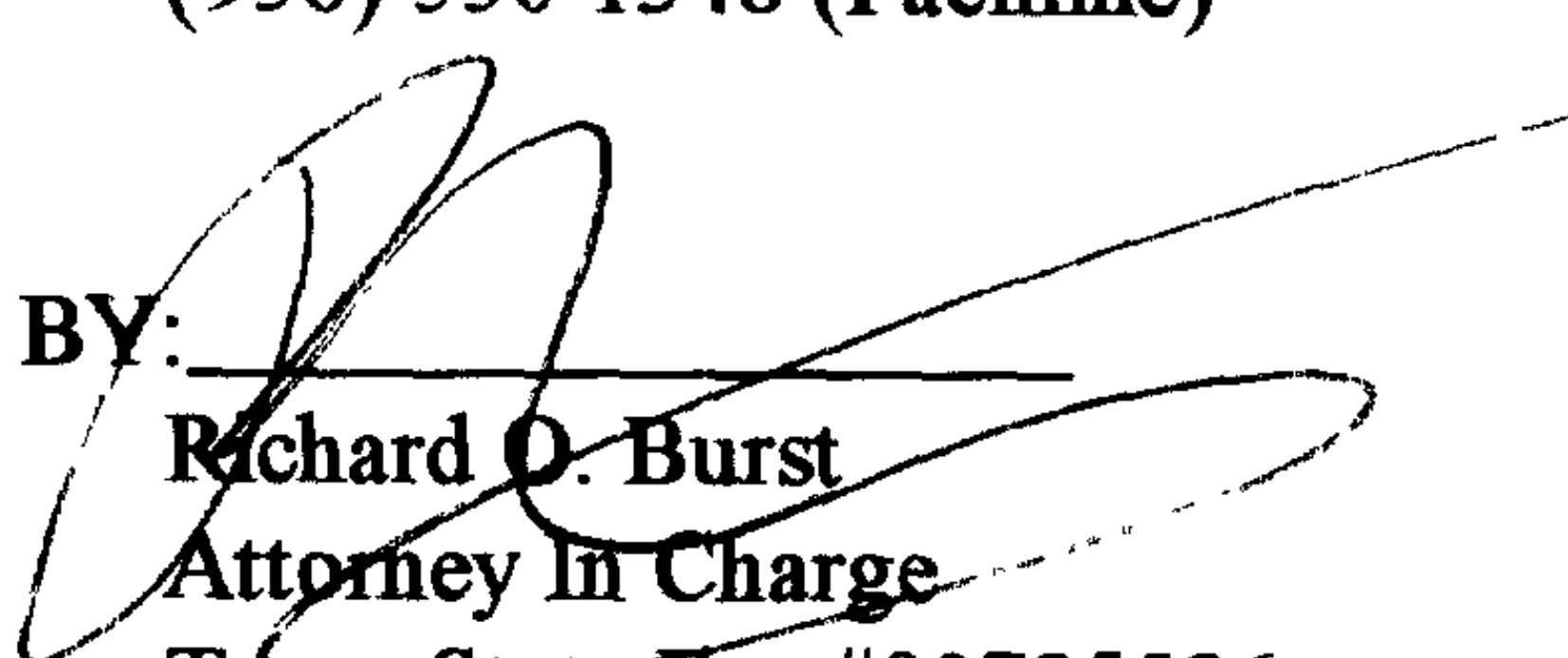
6. However, Defendant request that before mandatory mediation is ordered that Plaintiffs be required to respond to the interrogatories and production requests served on January 28, 1997.

WHEREFORE, Defendant prays this Court deny Plaintiffs' Motion For Mandatory Mediation.

Respectfully,

For Cameron County  
Cameron County Civil Legal Department  
964 East Harrison Street  
Brownsville, Texas 78578  
(956) 550 1345  
(956) 550 1348 (Facimile)

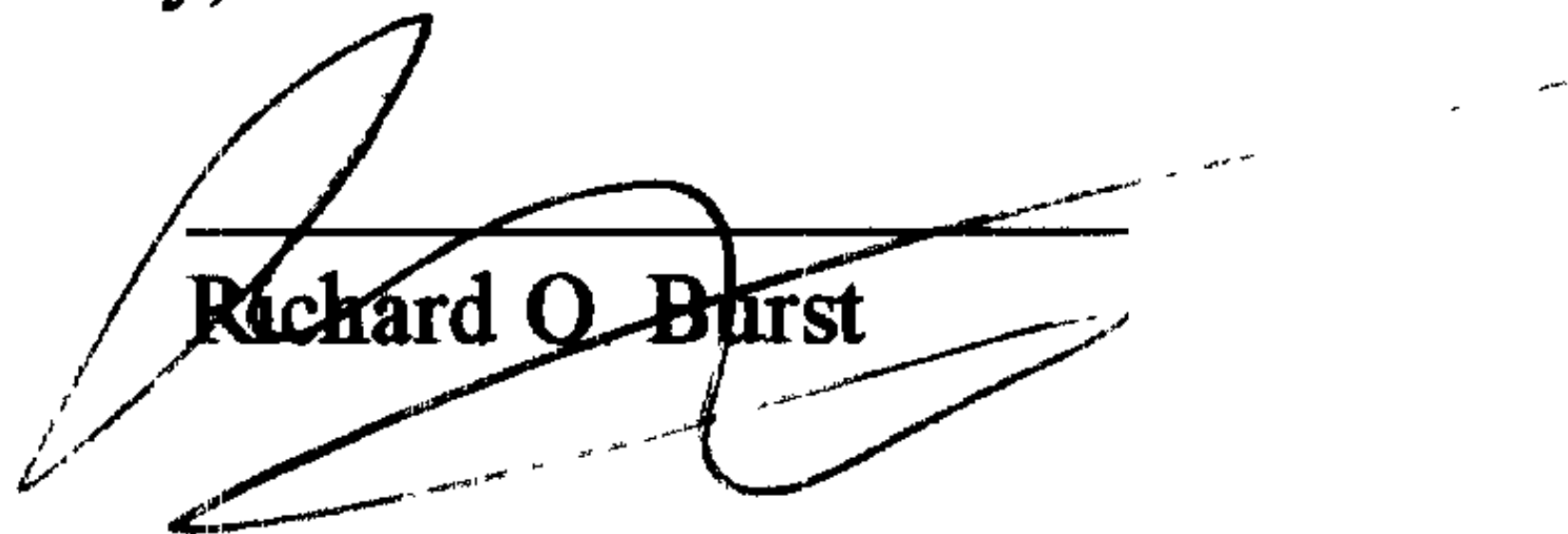
BY:

  
Richard O. Burst  
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Texas State Bar #00785586  
S.D. No. 15515

Dylbia L. Jefferies  
Of Counsel  
Texas State Bar #00786516  
S.D. No. 17065

**CERTIFICATE OF SERVICE**

I, Richard O. Burst do hereby certify that a true and correct copy of the foregoing Response has been mailed to Plaintiff's Attorney, James R. Herrmann, 802 E. Harrison, Suite 14, Harlingen, Texas 78551-2541 on this 30th of January, 1998.

  
Richard O. Burst